

DOCKET NO. 96-45 ORIGINAL

ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED

DEC 19 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Federal-State Joint Board on
Universal Service

)
)
)
)
)

CC Docket No. 96-45

COMMENTS OF NETACTION, COMPUTER PROFESSIONALS FOR SOCIAL
RESPONSIBILITY, UTILITY CONSUMER'S ACTION
NETWORK, COMMUNITY TECHNOLOGY CENTERS' NETWORK
AND CHALK REGARDING THE JOINT BOARD'S RECOMMENDED DECISION

Glenn B. Manishin
Christine A. Mailloux
Blumenfeld & Cohen-Technology Law Group
1615 M Street, N. W., Suite 700
Washington D.C. 20036
202.955.6300
info@technologylaw.com

Dated: December 19, 1996

No. of Copies filed 044
List ABCDE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RECEIVED
DEC 19 1996
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket No. 96-45
Universal Service)	
)	

COMMENTS OF NETACTION, COMPUTER PROFESSIONALS FOR SOCIAL
RESPONSIBILITY, UTILITY CONSUMER'S ACTION
NETWORK, COMMUNITY TECHNOLOGY CENTERS' NETWORK
AND CHALK REGARDING THE JOINT BOARD'S RECOMMENDED DECISION

NetAction, together with the Computer Professionals for Social Responsibility, Utility Consumer's Action Network, Community Technology Centers' Network and CHALK (collectively the "Internet Consumers"), by their attorneys, respectfully submit these comments in response to the Recommended Decision¹ released by the Federal-State Joint Board on Universal Service ("Joint Board").

INTRODUCTION

NetAction is a non-profit public interest organization whose mission is to promote effective grassroots campaigns linking online activists with other organizations, training online activists in effective organizing strategies, and educating the public, policy makers and the media about technology-based social and political issues.²

¹ *Federal-State Joint Board on Universal Service*, Recommended Decision, FCC 96J-3, CC Docket No. 96-45 (released November 8, 1996).

² For more information on NetAction, visit the organization's World Wide Web site at <<http://www.netaction.org>>.

The Computer Professionals for Social Responsibility ("CPSR") is a public interest alliance of information technology professionals and others concerned about the impact of computer technology on society. CPSR works to influence decisions regarding the development and use of computers. As technical experts, CPSR members provide the public and policy makers with realistic assessments of the
(Continued....)

NetAction assists those who are not "online" to accomplish vital politically and socially beneficial causes by using the power of online technology. In order to succeed in its mission, NetAction must first advocate for political and social policies which encourage growth and development of the Internet and electronic communications media and access to advanced communications for all Americans. NetAction's goals are furthered by affordable, effective and fair access to all electronic communications technologies.

NetAction has joined together with the Internet Consumers to offer the Commission a coordinated, consumer-oriented assessment of the Joint Board's universal service decision. The Internet Consumers analyzed the Joint Board's recommendations using two key criteria: (1) is the recommendation competitively neutral, and (2) is the recommendation technologically neutral? The first criterion is mandated by the Telecommunications Act of 1996.³ The second criterion, making sure that this Commission's universal service policy does not dictate or favor particular

power promise and limitations of computer technology. As concerned citizens, CPSR directs public attention to critical choices concerning the applications of computing and how those choices affect society.

Utility Consumer's Action Network ("UCAN") is a nonprofit membership organization which conducts consumer advocacy efforts regarding regulated industries, including telecommunications, cable and auto insurance. Recently, UCAN launched ICAN, the Internet Consumer Action Network, which is its cyberspace arm. ICAN's goal is to provide the same sort of consumer watchdog oversight for the Internet that UCAN provides for utility, insurance and cable television companies.

Community Technology Centers' Network ("CTCNet"), along with Playing To Win, its founding organization, envisions a society in which all people are equitably empowered by technology skills and usage. CTCNet is committed to achieving this end. CTCNet brings together agencies and programs that provide opportunities whereby people of all ages who typically lack access to computers and related technologies can learn to use these technologies in an environment that encourages exploration and discovery and, through this experience, develop personal skills and self-confidence.

Communities in Harmony Advocating for Learning and Kids ("CHALK") is a nonprofit, San Francisco-based organization dedicated to fueling community initiatives that increase active involvement in local public schools and the lives of children. CHALK is a sponsor of the Virtual Summit on Children and Youth <[http:// www.virtualsummit.com](http://www.virtualsummit.com)>.

³ The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996), to be codified at 47 U.S.C. § 151 *et. seq.*, § 254(b)(4)(the "1996 Act").

technologies, is crucial for healthy competition and continued innovation in technology.⁴ The computer industry is a vital and dynamic industry. Any policy that encourages access to advanced communications technologies must be flexible to support research and development and cannot, by default, lock in a particular technology. Additionally, many of the Internet Consumers' organizational goals, to bring the power of advanced communications technologies to community based organizations, are directly furthered by a universal service policy that is both competitively and technologically neutral.

The Internet Consumers will focus their comments on the policies suggested by the Joint Board for schools and libraries because these sections have the greatest potential to bring advanced communications to the broadest cross section of society, particularly to those groups which would not be able to directly access these technologies by themselves. We also urge the Commission to challenge industry and other regulators to improve customer service, broaden the types of services supplied to schools and libraries at or below cost, and to work with Congress to provide incentives to corporate America through favorable tax policies in order to assist schools and libraries in reaping the benefits of the Commission's universal service policies.

I. THE COMMISSION SHOULD ADOPT THE JOINT BOARD'S RECOMMENDATIONS FOR A TECHNOLOGICALLY NEUTRAL AND COMPETITIVELY NEUTRAL SYSTEM OF UNIVERSAL SERVICE

The Joint Board's recommendations capture the spirit of the 1996 Act by redefining universal service policy in light of increased competition and the relaxation

⁴ See Recommended Decision at ¶ 461.

of monopoly power. The Joint Board's recommendations for changing the definition of universal service are competitively and technologically neutral. The Joint Board did not mandate particular technologies as part of basic service, despite the urging of some commenters.⁵

Although the Internet Consumers support widespread access to the most advanced communications technologies, we agree with the Commission that Internet access should not, at this time, be included in the definition of basic telecommunications service.⁶ The economic and regulatory ramifications of including Internet access in the "core" group of basic services are complex and should not be decided now in light of the very rapid pace of technological change. However, the Internet Consumers strongly encourage the Commission to accept the Joint Board's recommendation to set up a formal review process to revisit the definition of basic service.⁷ Each of the Internet Consumers, as part of its mission, works towards universal access to the Internet and other advanced communications technologies. As these and other efforts continue, and as it becomes vital for consumers to have affordable access to advanced technologies, a new universal service policy, covering both information and enhanced services must be created, in addition to telecommunications services, will be an essential part of the evolving National Information Infrastructure.

The Internet Consumers support the recommended revisions to the universal service support mechanism. Consumers only need basic telecommunications service in

⁵ See Recommended Decision at Section IV.

⁶ See Recommended Decision at ¶ 69.

⁷ See Recommended Decision at ¶110.

order to access many advanced telecommunications and inform service technologies. The Internet Consumers support policies which increase competition for basic service among a broad cross section of ratepayers. By requiring all carriers that provide interstate telecommunications services to contribute to universal service support, the Joint Board removes the burden that interexchange carriers almost exclusively shouldered under previous rules. Additionally, the Joint Board has opened up the support mechanism to a broad group of carriers, no longer allowing only local exchange carriers to receive support from the universal service fund. The resulting support mechanism will thereby give all consumers, even those in the highest cost or lowest income brackets, a choice of telecommunications carriers and services, while still maintaining affordable rates.

II. ACCESS TO ADVANCED INFORMATION SERVICES BY SCHOOLS AND LIBRARIES IS A KEY COMPONENT OF THE INFORMATION AGE

The issue of school and library access to information services, including the Internet, is extremely important to the overall goal of universal access to advanced communications services. The Internet Consumers strongly support the policy created by Congress of encouraging carriers to assist schools and libraries in promoting advanced information service access. The Joint Board did no more than Section 254(h)(2) requires; however, the Joint Board's recommendations are comprehensive, and the Internet Consumers are confident that these recommendations, if adopted by the Commission, will further the goal of universal service.

The *Recommended Decision* not only fosters economic incentives through school and library discounts and the ability to aggregate into user consortia for affordable

access to basic telecommunications services, but also provides support for advanced services by allowing discounts for Internet access, wireless technology, internal connections and network services which will enable schools to effectively utilize education technology.⁸ Although the Internet Consumers believe that, in the long term, universal Internet access is an important public policy, they support the Joint Board's recommendation to begin with the school and library communities. School and library Internet access can "kickstart" the market by making subscribers spokespeople, thereby fueling demand which will then encourage the market to widely offer these services.

A. The Joint Board Has Correctly Excluded Internet Service Providers From Universal Support Obligations

Affordable telephone service is crucial, but the power of the technology is wasted without the ability to hook up that phone service to high-capacity wiring or wireless connections, and to the Internet itself. Therefore, the Joint Board recommends that Internet Service Providers ("ISPs") that provide e-mail and subscriptions for Internet access, and companies which provide intraschool/library connections and wiring, receive reimbursement from the universal service support mechanism when they offer discounts to schools and libraries.⁹ The Joint Board also determined, however, that the Commission does not have the authority to require ISPs and other non-telecommunications providers to contribute to the fund, and suggested that this

⁸ See Recommended Decision at ¶¶ 461, 462, 473, 474. NetAction agrees with Paragraph 629 which finds that if the Commission adopts the Joint Board's Recommended Decision, it will have satisfied the mandate in section 254(h) of the Act to enhance access to advanced services by schools and libraries. Net Action encourages the Commission to closely monitor the developments in the industry and consider a request to revisit the requirements of 254(h).

⁹ See Recommended Decision at ¶¶ 462, 473.

universal service docket is not the appropriate place to determine regulatory treatment for Internet access at this time.¹⁰

The Internet Consumers support the Joint Board's recommendation on Internet access, but caution that to allow ISPs to receive support from the fund, while not requiring them to contribute, is inherently unstable, and open to possible appellate challenge. However, if the ultimate goal is to balance the policies necessary to create an open competitive market while still maintaining a safety net for universal service, the Joint Board struck the proper balance, for now. Under the Act and previous Commission decisions, the Commission cannot require ISPs or providers of computer equipment, to contribute to the fund because they are not "telecommunications carriers." On the other hand, it is vital for competition that schools and libraries have a choice of companies when purchasing Internet access and internal connections. The Joint Board properly interpreted the Act to require competitively neutral rules to advance universal service policies, rather than limit support to providers which must meet the narrow definition of "telecommunications provider."¹¹ If the Joint Board limited the benefits of the universal service support mechanism to interstate telecommunications providers, then only those companies—and not ISPs, cable companies or other providers of Internet access—would be able to compete at the discounted rates. The Joint Board's recommendations allow smaller ISPs and computer companies to compete on a level playing field with telecommunications providers.

¹⁰ See Recommended Decision at ¶¶ 464, 790.

¹¹ See Recommended Decision at ¶ 484.

B. The Commission Must Go a Step Further and Challenge Industry And Government to Incorporate Universal Service Policies Into Their Business Decisions

Commission decisions do not exist in a vacuum. The Commission's universal service policy will have widespread effects on other federal agencies, state and local governments, and the telecommunications and computer industries. Although the Commission has a limited regulatory mandate on universal service, this decision will be very influential to other agencies and groups as they set their own communications and technology policies. Therefore, the Internet Consumers believe the Commission should challenge other decision makers to embrace federal universal service principles and integrate the Commission's policies into their own actions. The final universal service decision will be a catalyst to enhance access by a broad spectrum of society to a broad spectrum of electronic services.

**1. The Computer and High-Technology Industries Must Improve Customer Service and Technical Support
For New and Inexperienced Users or Risk Increased Regulation**

The Internet Consumers urge this Commission to challenge the computer and telecommunications industries to improve the reliability and technical support for its products and services. The computer, and to some extent telecommunications, industries have notoriously poor performance history in customer and technical support. To exacerbate this problem, the Commission's universal service policy will broaden the customer base of many technology products. Many of these new users will not have the ability to hire experts to help them install and learn new software and hardware products. Additionally, many of these new constituencies will be vulnerable

to computer problems and will not have the resources to trouble-shoot or resolve the problems themselves. Large institutions, such as cash-strapped public schools and libraries, will have difficulty effectively integrating this new communications asset.

Most industries have learned the hard way, through cut-throat competition, that good customer service can set a company apart. As the Internet Consumers have also learned, through their work with grass roots organizations that are just beginning their journey into cyberspace, "technophobia" is not an imaginary illness. Computers and software are often complicated and require detailed and clear user instructions. Computer company technical support, helplines, instruction books, and "online" help functions are often impossible to navigate. Many computer companies claim to have "24 hour" technical support which is busy 24 hours a day, bordering on the edge of false advertising. *This must be changed.* As the Commission encourages groups and individuals to use technology in their everyday business, through discounts for products, the Commission should also encourage companies to be accountable for customer support.

If the ultimate benefits from congressional and Commission policies are diminished because of downstream problems, many high-tech companies risk outcry by the public and, as a result, increased local, state and federal government involvement in their industries. As a general principle, the Internet Consumers believe that strong and meaningful industry guidelines, and increased sensitivity to consumer concerns fueled by competition, are more likely to affect change than government regulation; however, in many situations government regulation is not only a good policy, but vital to protecting consumers. The Internet Consumers urge the Commission to challenge these

companies to improve customer service in order to create a comprehensive and systemic federal universal service policy.

2. There is an Expanded Role for "Net Day" Projects in Light of the New Federal Universal Service Policy Towards Schools and Libraries

The Internet Consumers also encourage the Commission to challenge the computer industry to transform current "Net Day" projects into an ongoing industry practice which will *supplement* the Commission's new policies. Net Day is a relatively recent tradition where computer and high technology companies take one day to go into their communities and help "wire the schools." However, people and wire together can be cheap commodities, while wires by themselves are not very useful. Once the wire is put in place, the experts leave overburdened teachers and administrators with the job of making Internet connectivity actually useful to students.¹²

The concept of Net Day is by no means obsolete despite the fact that the Joint Board recommends spending \$2.25 billion annually on Internet access for K-12 schools and libraries. To the contrary, this sort of public/private partnership is needed now more than ever. Schools and libraries need much more than discounts on intraschool/library wiring, Internet access and e-mail to efficiently and effectively utilize the technology.¹³ Support for ongoing operations, training, upgrade and

¹² See, e.g., McKinsey & Company, *Connecting K-12 Schools to the Information Superhighway* at ix (1996) ("McKinsey Report"). The McKinsey Report stresses the importance of support from the "bottom-up" with involved and committed teachers and staff.

¹³ The McKinsey report found the cost of connection is a relatively small portion of the overall expenditures. McKinsey Report at 28.

maintenance costs are crucial to success, but also account for the largest percentage of costs.¹⁴

Fearing that discounted technology will not be used effectively by the schools and libraries, the Joint Board requires the schools and libraries to present a plan on how they will obtain other supporting equipment to allow them to fully realize the benefits of those services which they will receive at a discount.¹⁵ These plans create an automatic demand for "one-stop shopping" for peripheral and related software, hardware, and services. However, in order to afford the ongoing administrative costs, many schools will also need these related services at a discount. By encouraging private/public partnerships, this Commission must challenge the computer industry to further universal access to advanced services in the non-telecommunications arena beyond the Commission's jurisdiction.

3. Other Federal and State Regulatory Agencies Must Also Create Incentives for Carriers to Move Beyond Basic Service

Finally, the Internet Consumers encourage this Commission to challenge other government agencies, with responsibility for tax and telecommunications policy, to further the goals of universal service through incentives to companies to encourage them to take universal goals even farther. Policies such as tax advantages for selling products or performing services at or below cost for schools and libraries, or encouraging private-public partnerships along the lines of community redevelopment agencies, would certainly motivate companies to supplement the commission's actions.

¹⁴ *Id.* at 35.

Policies which provide incentives to companies to provide discounted products at, or below, cost, or in-kind contributions, rather than policies which are punitive in nature, would be much more productive towards advancing universal service.

To the extent that changes in the tax laws are needed to encourage the provision of education technology at cost, the Internet Consumers urge the Commission to work with Congress and the White House to make these changes a reality in order to continue, and expand, the participation of high-tech companies in the deployment of education technology.

IV. A BROAD UNIVERSAL SERVICE POLICY WILL ENSURE INCREASED ACCESS TO ADVANCED TELECOMMUNICATIONS SERVICES

As the race for faster, more reliable technologies picks up speed, even those with the most basic communications needs must keep up. The 1996 Act recognizes that special efforts must be made to upgrade large sectors of society so that they are not left behind. Newer technologies such as fiber optics, ISDN, and improved switching capability, can turn POTS into "plain old" *electronic* communications which will allow even the most basic telephone consumer to communicate with a computer or a television in addition to a telephone.

This new technology not only allows advances in the concept of POTS, but dictates it. This is a diverse and fast paced society. The ability to communicate across broad geographic boundaries is vital to functioning in today's society. Only in the farthest reaches of the globe can someone still head down to the local barber shop, or

¹⁵ See Recommended Decision at ¶ 601.

listen on a party line, to learn what is happening in his or her community. As more and more businesses, government agencies and community organizations conduct their business via electronic communications media, everyone must have access to the various media to effectively function in society.

The Internet Consumers see a valuable role for larger institutions such as community-based organizations, schools, libraries and other government agencies, to introduce, and teach the value of, online communications to local citizens who are not yet online. As individuals, who may not even own a phone, begin to sample the power of the technology by an occasional trip to the library, neighborhood outreach office or after-hours school program, they will spur increased demand for these more sophisticated products.

This top-down approach to spur competition for the more diverse market, will help to bring advanced telecommunications technology into the community, and eventually into homes. However, as Congress anticipated with the 1996 Act, in order to accomplish this task, government regulatory policies towards telecommunications must adapt. In many instances the appropriate policy is to allow federal and state governments to relax their regulations and allow new entrants to the market to flourish and be a catalyst for health competition. In other instances, regulations must be redirected in a new direction, and in some cases strengthened, to allow those parts of the population, easily left behind by imperfect market-based competition, to benefit from innovation and competition.

CONCLUSION

The Internet Consumers support the Joint Board's *Recommended Decision* and encourage its adoption by the Commission. As nonprofit organizations dedicated to bringing advanced communications services to a broad spectrum of society, the Internet Consumers believe the recommendations regarding school and library access to advanced technologies are an important first step in the goal of obtaining universal access to the Internet and other forms of electronic communication. Additionally, Internet Consumers also encourage the Commission to issue a final decision which challenges the computer and telecommunications industries, as well as state and federal decision makers, to institute policies and practices which give wide spread effect to the Commission's universal service policies.

Respectfully Submitted,


By: Christine A. Mailloux / GBM
Glenn B. Manishin
Christine A. Mailloux
Blumenfeld & Cohen-Technology Law Group
1615 M Street, N. W., Suite 700
Washington D.C. 20036
202.955.6300
info@technologylaw.com

*Counsel for NetAction, CPSR, UCAN, CTCNet
and CHALK*

Dated: December 19, 1996

CERTIFICATE OF SERVICE

I, Cindy Miller, do hereby certify on this 19th day of December, 1996, that I have served a copy of the foregoing document via first class mail, postage prepaid, to the parties below:


Cindy Miller

The Honorable Reed E. Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W. - Room 814
Washington, D.C. 20554

The Honorable Rachel B. Chong
Commissioner
Federal Communications Commission
1919 M Street, N.W. - Room 844
Washington, D.C. 20554

The Honorable Susan Ness
Commissioner
Federal Communications Commission
1919 M Street, N.W. - Room 832
Washington, D.C. 20554

The Honorable Julia Johnson
Commissioner
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399-0850

The Honorable Kenneth McClure
Commissioner
Missouri Public Service Commission
301 W. High Street, Suite 530
Jefferson City, MO 65101

The Honorable Sharon L. Nelson
Chairman
Washington Utilities and Transportation
Commission
PO Box 47250
Olympia, WA 98504-7250

The Honorable Laska Schoenfelder
Commissioner
South Dakota Public Utilities Commission
State Capitol, 500 E. Capitol Street
Pierre, SD 57501-5070

Martha S. Hogerty
Public Counsel for the State of Missouri
PO Box 7800
Jefferson City, MO 65102

Paul E. Pederson, State Staff Chair
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

Lisa Boehley
Federal Communications Commission
2100 M Street, NW, Room 8605
Washington, DC 20554

Charles Bolle
South Dakota Public Utilities Commission
State Capitol, 500 E. Capitol Street
Pierre, SD 57501-5070

Deonne Bruning
Nebraska Public Service Commission
300 The Atrium
1200 N Street, PO Box 94927
Lincoln, NE 68509-4927

James Casserly
Federal Communications Commission
Office of Commissioner Ness
1919 M Street, NW, Room 832
Washington, DC 20554

Bryan Clopton
Federal Communications Commission
2100 M Street, NW, Room 8615
Washington, DC 20554

Daniel Gonzalez
Federal Communication Commission
Office of Commissioner Chong
1919 M Street, NW, Room 844
Washington, DC 20554

L. Charles Keller
Federal Communications Commission
2100 M Street, NW, Room 8918
Washington, DC 20554

David Krech
Federal Communications Commission
2025 M Street, NW, Room 7130
Washington, DC 20554

Diane Law
Federal Communications Commission
2100 M Street, NW, Room 8920
Washington, DC 20554

Robert Loube
Federal Communications Commission
2100 M Street, NW, Room 8914
Washington, DC 20554

Sandra Makeeff
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

Michael A. McRae
DC Office of the People's Counsel
1133 15th Street, NW, Suite 500
Washington, DC 20005

John Clark
Federal Communications Commission
2100 M Street, NW, Room 8619
Washington, DC 20554

Irene Flannery
Federal Communications Commission
2100 M Street, NW, Room 8922
Washington, DC 20554

Emily Hoffnar
Federal Communications Commission
2100 M Street, NW, Room 8623
Washington, DC 20554

Lori Kenyon
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501

Debra M. Kriete
Pennsylvania Public Utilities Commission
PO Box 3265
Harrisburg, PA 17105-3265

Mark Long
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399

Samuel Loudenslager
Arkansas Public Service Commission
PO Box 400
Little Rock, AR 72203-0400

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Tejal Mehta
Federal Communications Commission
2100 M Street, NW, Room 8625
Washington, DC 20554

Terry Monroe
New York Public Service Commission
3 Empire Plaza
Albany, NY 12223

John Morabito
Deputy Division Chief, Accounting and
Audits
Federal Communications Commission
2000 L Street, NW, Suite 812
Washington, DC 20554

Mark Nadel
Federal Communications Commission
2100 M Street, NW, Room 8916
Washington, DC 20554

John Nakahata
Federal Communications Commission
Office of the Chairman
1919 M Street, NW, Room 814
Washington, DC 20554

Lee Palagyi
Washington Utilities and Transportation
Commission
1300 South Evergreen Park Drive, SW
Olympia, WA 98504

Kimberly Parker
Federal Communications Commission
2100 M Street, NW, Room 8609
Washington, DC 20554

Barry Payne
Indiana Office of the Consumer Counsel
100 North Senate Ave., Room N501
Indianapolis, IN 46204-2208

Jeanine Poltronieri
Federal Communications Commission
2100 M Street, NW, Room 8924
Washington, DC 20554

James Bradford Ramsay
National Association of Regulatory Utility
Commissioners
PO Box 684
Washington, DC 20044-0684

Brian Roberts
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Gary Seigel
Federal Communications Commission
2000 L Street, NW, Suite 812
Washington, DC 20554

Richard Smith
Federal Communications Commission
2100 M Street, NW, Room 8605
Washington, DC 20554

Pamela Szymczak
Federal Communications Commission
2100 M Street, NW, Room 8912
Washington, DC 20554

Lori Wright
Federal Communications Commission
2100 M Street, NW, Room 8603
Washington, DC 20054